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DOCUMENT
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MEMO ENDORSED



The Rosen Law Firm
INVESTOR COUNSEL

Granted

SO ORDERED

LEWIS A. KAPLAN, USDJ

12/19/24

December 17, 2024

The Honorable Lewis A. Kaplan
United States District Court, Southern District Court of New York
500 Pearl Street
New York, NY 10007

Re: In re DiDi Global Inc. Secs. Litig., No. 1:21-cv-05807

Dear Judge Kaplan:

We represent Lead Plaintiff Junhong Cao, and named plaintiffs Shereen El-Nahas, Daniil Alimov, Alaka Holdings Ltd., Bosco Wang, and Njal Larson (collectively, "Plaintiffs"), in the above-referenced matter. Pursuant to the Confidentiality Stipulation and Protective Order (ECF 190), SDNY Local Rule 6.8, and Your Honor's Individual Filing Practices, we write to request permission to file under seal Plaintiffs' Motion to Compel DiDi's Rule 30(b)(6) Deposition Testimony and certain exhibits attached and publicly file a version of the letter motion with placeholder exhibits.

Plaintiffs have attached as exhibits to their Motion to Compel documents that have been designated confidential under the Protective Order or documents that contain discussions of such confidential information. Plaintiffs ask the Court to seal the following documents because they are confidential or contain confidential information: (i) Plaintiffs' Amended Rule 30(b)(6) notice to DiDi, dated October 2, 2024 (Exhibit 2); (ii) DiDi's Responses and Objections to Rule 30(b)(6) Notice, dated October 24, 2024 (Exhibit 3); (iii) Excerpts of transcript of the October 30 and October 31, 2024 Deposition of Jimin Pang (Exhibit 4); (iv) a table of selected questions and answers from Mr. Pang's deposition (Exhibit 5); Email chain between counsel concerning discovery issues, dated November 11, 2024 (Exhibit 6); Letter from defense counsel concerning PRC blocking statutes, dated November 26, 2024 (Exhibit 7); DiDi's PRC Law Withhold Log and PRC Law Redaction Log, dated December 16, 2024 (Exhibit 8); Declaration of Professor Zhang Hong (Exhibit 9); and Morgan Stanley's Privilege Log, dated November 14, 2024 (Exhibit 10).

The foregoing documents and deposition excerpts should be designated "Confidential" under the Protective Order. The Protective Order provides that all "documents designated as "CONFIDENTIAL" shall not be disclosed to any person" other than, *inter alia*, the parties, their counsel, the Court, and other individuals agreed to by the parties. (ECF 190, ¶ 7.)

The foregoing exhibits attached to Plaintiffs' Motion to Compel include communications